

REMARKS

Applicants wish to acknowledge the telephone interview conducted with Applicant's representatives D'Ann Naylor Rifai (Reg. No. 47,026) and Marc Ascolese (Reg. No. 42,268) on December 14, 2005 and to thank the Examiner for his clarification of the rejections of claim 28 and new claims 55-57. While no agreement was reached regarding allowability of the claims, Applicants believe that the amendments submitted herein are consistent with the positions expressed during the interview and place the application in condition for allowance.

Claims 27-61 are pending in the application. Claims 27-57 stand rejected. Claims 28, 43, 47, and 51 have been cancelled. Claims 58-61 have been added. Independent claims 27, 42, 46, and 50 have been amended, as have dependent claims 29, 32, 36-41, 44, 48, and 52. Support for the amendments to independent claims 27, 42, 46, and 50 can be found in the originally-filed specification in paragraphs 44-46, Figs. 3A through 3F, and paragraphs 48-56, *inter alia*. Support for new claims 58-61 can be found in the originally-filed specification in paragraphs 54-56 and Figs. 3E and 3F, *inter alia*.

Rejection of Claims under 35 U.S.C. §102

Claims 27-57 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Krishnamurthy, U.S. Patent No. 6,823,436 ("Krishnamurthy"). Applicants respectfully traverse this rejection. Independent claim 27 has been amended to include the following limitations:

in response to a request to perform an operation on a first set of locations of a plurality of locations in a storage area:
comparing at least one location of the first set of locations to at least one location description, wherein
the at least one location description has a corresponding property describing a type of operation; and
performing the operation upon a given location in the first set of locations of the plurality of locations in the storage area only if the given location is described in the at least one location description.

Independent claims 42, 46, and 50 also have been amended to include substantially similar limitations.

Applicants respectfully submit that Krishnamurthy does not teach or suggest "comparing at least one location of the first set of locations to at least one location description," as required by independent claims **27, 42, 46, and 50**. Furthermore, Krishnamurthy does not teach or suggest that "the at least one location description has a corresponding property describing a type of operation," as also required by independent claims **27, 42, 46, and 50**. Because all of the limitations of the independent claims are not taught by Krishnamurthy, independent claims **27, 42, 46, and 50** are allowable for at least this reason. Accordingly the respective dependent claims **28-41, 43-45, 47-49, and 51-54** are allowable for at least this reason. New claims **58-61** are also allowable for this reason.

In summary, claims **27-61** are allowable for at least the foregoing reasons.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5086.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on December 22, 2005.



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12/22/05
Date of Signature

Respectfully submitted,



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